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**COUNTY OF MENDOCINO**  
**AIR QUALITY MANAGEMENT DISTRICT**  
UKIAH, CALIFORNIA 95482

April 9, 2002

Forrest D. Denney,  
Environmental Manager – Lumber Division  
Georgia Pacific Corporation  
P. O. Box 105605  
Atlanta, GA 30348

Subject: Administrative Changes to Title V Permit to Operate, Special Conditions.

Dear Mr. Denney:

I am writing in response to your letter dated March 27, 2002, requesting administrative changes to Georgia Pacific's Title V Permit for the Fort Bragg Mill. Per your request the District has removed any language in the permit associated with the burning of urban wood waste and the relevant metals limits. Be advised that by removal of this language, Georgia Pacific will no longer be allowed to use urban wood waste (demolition wood) as fuel for the boilers at the Fort Bragg facility. Attached are replacement pages 39 and 40 of the Title V Permit to Operate. These pages reflect the changes requested. Please replace these pages in all copies of the permit.

Thank you. If you have questions, please call the District office at 707/463-4354.

Sincerely,

C.D. Wolbach, Ph.D.  
Air Pollution Control Officer

CDW:dmr

A^Title V\GPW Ltr 4-09-02

**V. Plant Wide Special Conditions**

**A. Fuel Limitations**

1. PERMITTEE shall use only wood waste products (bark, chips, and sawdust) as primary fuel.
2. Fuel oil sulfur content shall not exceed 1.75% on a daily average basis nor 1.55% on an annual average basis, as determined by ASTM Method D115-68 or D129-64

[Auth §V(A)(1) & (2): MCAQMD Permit No. 0120-1-20-82-01-1]

**3. Record keeping and reporting:**

- a). PERMITTEE shall maintain a permanent record of daily fuel usage that includes:
  - i. Wood waste (hogged) fuel consumed, measured in bone dry tons.
  - iv. Fuel oil consumed in U.S. gallons.
  - v. Length of time fuel oil consumed.
  - vi. Sulfur content of each lot of fuel purchased.
- b). PERMITTEE shall provide the records to the District on an annual basis and at such other times as deemed necessary by the District. The annual period shall be from January through December. The report shall be furnished to the District by February 1 of the year following the reporting period.

[Auth §V(A)(6): MCAQMD Permit No. 0120-1-20-82-01-1]

**B. Dust Mitigation Measures {District}**

PERMITTEE shall at all times operate the plant, log yard or lumber yard, fuel house truck dump, fuel house beach storage pile area, soil amendment areas, and all supporting activities in such a manner as to minimize fugitive dust emissions and ensure compliance with Mendocino County Air Pollution Control District Regulation 1, Rule 430 (fugitive dust emissions). This requirement shall include but not be limited to:

1. The prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or by other means.
2. The application of asphalt, water, or suitable chemicals on dirt roads, material stockpiles, and other surfaces which can give rise to airborne dust.
3. The paving of roadways and their maintenance in a clean condition.
4. Limiting vehicle speed to not more than 10 mph on unpaved surfaces in the immediate area of the plant.
5. Keeping soil amendment lay-downs damp before and during tilling operations.
6. The appointment and designation by name of a dust control officer. This person shall have the responsibility and requisite authority to ensure that plant operations, including control of fugitive dust emissions, are in compliance with District regulations at all times. PERMITTEE shall provide to the District in writing the name of the person appointed within thirty days of issuance of this permit, and thereafter upon change.

[Auth §V(B): MCAQMD Regulation 1, Rule 430, Permit No. 0120-1-20-76-10-2]

C. Fugitive Emissions Mitigation Measures **{District}**

PERMITTEE shall inspect all ductwork associated with fugitive dust collection systems for leaks once a month. Any leaks detected shall be repaired within ten days. Any visible accumulation of sawdust on exterior horizontal surfaces (except for storage piles) shall be removed within ten days of discovery.

[Auth §V(C): MCAQMD Regulation 1, Rule 430(a), Permit No. 0120-1-20-76-10-2]

D. Gasoline Storage Tank with Phase II Vapor Recovery **{District Only. Not Federally enforceable}**

PERMITTEE shall operate the gasoline storage and dispensing system in compliance with District Regulation 3, Rule 1.

[Auth §V(D): MCAQMD Regulation 3, Rule 1, Permit No. 0120-]

E. Cooling Tower

PERMITTEE shall insure that the cooling tower meets all requirements of District Regulation 3, Rule 3.

[Auth §V(E): H&SC §39662, MCAQMD Regulation 3, Rule 3]

F. Maintenance of dust collection systems

PERMITTEE shall maintain in good working order without leaks and operate according to manufacturer's specifications system collection devices (inlets), contaminant transport systems (duct work), air movers (blowers), instrumentation (controls), subsystems (sprays, valves), and material feed and containment systems (hoppers and bins).

[Auth. §V(F): MCAQMD Permit No. 0120-1-20-96-53-9 and others]

G. Risk Management Plan

If the PERMITTEE becomes subject to Federal Risk Management Plan requirements, PERMITTEE shall respond in a timely manner.

[Auth §V(G): 40 CFR 70]